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**April 2, 2020**

**Via ECF**

Hon. Mary Kay Vyskocil, USDJ  
United States District Court, SDNY  
500 Pearl Street, Courtroom 18C  
New York, 10007 NY  
Tel: 212-805-0292

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| USDC SDNY<br>DOCUMENT<br>ELECTRONICALLY FILED<br>DOC #:<br>DATE FILED: <u>4/3/2020</u> |
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**Re: Martin v. NYC Crane Hoist & Rigging, LLC**  
**Case #: 19-CV-03789 (MKV)(BCM)**  
**Motion for Extension of Time**

Dear Judge Vyskocil:

My firm represents plaintiff in the above-referenced action, and I respectfully write on behalf of the parties to request a two-week extension of the April 2, 2020 deadline to provide the Court with a status report as per Your Honor's February 28, 2020 order. This request is being made because the mediation was adjourned due to the challenges created by the COVID-19 virus and the parties need some additional time to further confer as to the several cases pending, especially in light of the disruptions in the Court system, New York State and across the Country.

We thank the Court in advance for its time and consideration.

Respectfully submitted,  
Abdul Hassan Law Group, PLLC


/s/ Abdul Hassan

By: Abdul K. Hassan, Esq.

**cc: Defense Counsel via ECF**

**Granted. SO ORDERED.**

Date: 4/3/2020  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge